

DATE: August 8, 2001

DSL-BQA-01-033

TO: Nursing Homes  
Nurse Aide Training Programs

NH 18  
NATP 12

FROM: LaVern Woodford, Chief  
Resident Care Review Section/Bureau of Quality Assurance

Donna Cochems, Chief  
Caregiver Regulation and Investigation Section/Bureau of Quality Assurance

cc: Susan Schroeder, Director  
Bureau of Quality Assurance

**Clarification of Nurse Aide Training Requirements:  
Transporting Versus Transferring Nursing Home Residents**

In DSL-BQA-01-022, dated May 11, 2001, we informed you that single task workers in federally-certified nursing homes would no longer be permitted as of January 23, 2002. We stated, "Any employee who has not successfully completed a nurse aide training and competency evaluation test will no longer be allowed to provide direct nursing related services in a nursing home after January 23, 2002."

On July 5, 2001 we received clarification from the Center for Medicare and Medicaid Services (CMS, formerly known as the Health Care Financing Administration) with respect to whether a person who transports nursing home residents is required to be a certified nursing assistant. According to this clarification, a person who simply transports nursing home residents **does not** need to be certified as a nursing assistant. "Transporting" means pushing the resident in a wheelchair from one location to another or driving the resident in a vehicle from one location to another; it does not include helping the resident from bed to the wheelchair or assisting the resident from the wheelchair to the toilet or bath. The latter services must be performed by a licensed nurse or by a certified nursing assistant (i.e., one who has completed the nurse aide training and competency evaluation).

According to this memo from CMS, a copy of which is attached, "transporting residents" is "the only nursing home service that does not require the use of nurses aides with 75 hours of training."

If you have questions, please contact the Caregiver Regulation and Investigation Section or your Regional Field Operations Director at the number listed below.

**Caregiver Regulation and Investigation Section**  
(608) 261-7650

**Kevin Coughlin**  
Regional Field Operations Director  
Northeastern (Green Bay) Regional Office  
(920) 448-5249

**Joanne Powell**

Regional Field Operations Director  
Northern (Rhineland) Regional Office  
(715) 365-2802

**Patricia Benesh**

Regional Field Operations Director  
Southeastern (Milwaukee) Regional Office  
(414) 227-4908

**Phyllis Tschumper**

Regional Field Operations Director  
Southern (Madison) Regional Office  
(608) 243-2374

**Joe Bronner**

Regional Field Operations Director  
Western (Eau Claire) Regional Office  
(715) 836-4753